

**To:** Stephen A. Studer[sstuder@kdlegal.com]  
**Cc:** 'Susan Franzetti'[sf@nijmanfranzetti.com]; Frank Deveau (fdeveau@taftlaw.com)[fdeveau@taftlaw.com]; Kirchner, Karen[kirchner.karen@epa.gov]; Zaharoff, Josh[Zaharoff.Josh@epa.gov]  
**From:** Krueger, Thomas  
**Sent:** Wed 8/19/2015 8:09:49 PM  
**Subject:** RE: Additional PRP Information

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Thank you Stephen.

In order to get the most productive response possible from Omnisource, I would appreciate any information you might have on the best person and/or corporate division to direct the request to, and any other details or particulars we might include in the request to make sure they are looking at/for the right things.

Tom Krueger

**From:** Stephen A. Studer [mailto:ssuder@kdlegal.com]  
**Sent:** Wednesday, August 19, 2015 1:01 PM  
**To:** Krueger, Thomas  
**Cc:** 'Susan Franzetti'; Frank Deveau (fdeveau@taftlaw.com)  
**Subject:** Additional PRP Information

Dear Tom: I am not sure where the Agency is on issuing §104 (e) requests with respect to information previously provided by the current PRPs, but I have some additional information to share with you. First, we have come across information that OmniSource has information relating to insurance policies in which the insured allegedly is Sturgis Iron & Metal. We are not sure whether the Agency is aware of these policies or not but would request the Agency to issue appropriate subpoenas in order to get whatever information relating to the insurance policies is available. As you know, the none of the current PRPs feel culpable for the existing contamination, but are willing to work with the USEPA to resolve the matter. That said, there seems little doubt that Sturgis Iron & Metal is a PRP with respect to the contaminant plume and if there is available insurance coverage it would help move this process forward.

In addition, there is a property at 1840 Borneman, now known as Quad 4 Plastics, but which was previously used by Valley Machine Tool". It could be a site that used the contaminants of concern. Second is a property at 1845 Fieldhouse. This property is just west of MW-021-S. We believe this property is owned by Jason Industries, Inc. This company also has a site on Lusher and we understand refused testing by the USEPA at its Lusher site. The Fieldhouse property is, we believe, property previously owned and used by them in the 1970s.

Best, Stephen

Stephen A. Studer

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